## UNITED STATES DISTRICT COURT EASTERN DISTRICT OF MISSOURI EASTERN DIVISION

LORI CALLANDER,	)	
Plaintiff,	)	
v.	)	No. 4:16-CV-01697-JME
PENNYMAC LOAN SERVICES, LLC,	)	
Defendants.	)	

## **MOTION FOR REMAND**

COMES NOW Plaintiff, Lori Callander, by and through her counsel of record and in support of her Motion states as follow:

- On October 18, 2016 Plaintiff filed her Complaint in the Circuit Court of St. Louis County, State of Missouri.
- 2. Defendant removed this action to federal court on November 1, 2016 on the basis of diversity of citizenship and the amount in controversy.
- 3. This Court lacks subject matter jurisdiction under the Younger Abstention Doctrine and the Prior Exclusive Jurisdiction Doctrine.
- 4. For the reason set out in Plaintiff's Memorandum of Law the court must remand this matter back to state court.

WHEREFORE Plaintiff respectfully prays this Court enter an Order remanding this matter back to state court and for such other and further relief as this Court deems just and proper under the circumstances.

Respectfully submitted,

/s/ Angela Redden-Jansen Angela Redden-Jansen, #42684 Andrew Sandroni, #35105 3350 Greenwood Blvd. Maplewood, MO 63143 (314) 645-5900 (telephone) (314) 645-5990 (facsimile) amredden@swbell.net Attorneys for Plaintiffs

## **Certificate of Service**

The undersigned hereby certifies that on this 17th day of November, 2016, a true copy of the foregoing was filed electronically using the Court's CM/ECF system, to be served via operation of the Court's electronic filing system upon Jennifer Briner.

/s/Angela Redden-Jansen